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Policies and Procedures

Title: Procedures for Paying for Off-the-Shelf Training

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Originating Office: Acquisition and Property Division, AFM/ARS

This Replaces: **P&P 213.4**, dated September 19, 2011

Distribution: REE Offices in Headquarters, Areas, and Field Locations

This P&P is revised to update the billing instructions and payment offices.

Table of Contents

1.	Introduction.....	2
2.	References.....	2
3.	Definitions.....	2
4.	Background.....	3
5.	Conditions for Using the SF-182.....	3
6.	Policy.....	4
7.	Billing Instructions.....	4

1. Introduction

This policy establishes procedures for paying for commercial (off-the-shelf) training priced at \$150,000 or less.

2. References

- Office of Personnel Management Training Policy Handbook: Authorities and Guidelines -
(http://www.opm.gov/hrd/lead/pubs/handbook/Training_policy_hndbk04.pdf)
- Civilian Agency Acquisition Letter 99-2 – Governmentwide Commercial Purchase Card Purchases Above the Micro-Purchase Dollar Threshold -
(<http://www.acquisition.gov/comp/caac/caacletters/cl99-02.pdf>)
- Departmental Regulation 5013-6 – Use of Purchase Cards and Convenience Check –
(<http://www.ocio.usda.gov/directives/doc/DR5013-006.htm>)
- Executive Order No.11348 – Providing for the Further Training of Government Employees – (<http://cpol.army.mil/library/permis/7eo11348.html>)
- Title 5, Chapter 41, United States Code, Training
(<http://uscode.house.gov/download/pls/05C41.txt>)
- Parts 410 and 412, Title 5, Code of Federal Regulations –
(http://www.gpo.gov/nara/cfr/waisidx_04/5cfr410_04.html) and
(http://www.gpo.gov/nara/cfr/waisidx_04/5cfr412_04.html)
- Treasury Financial Manual Part 4, Chapter 4500 –
(<http://www.fms.treas.gov/tfm/vol1/v1p4c450.txt>)
- ARS/AFM/HRD P&P 440.1 – Employee Training and Development –
(<http://www.afm.ars.usda.gov/ppweb/PDF/440-01.pdf>)

3. Definitions

Commercial (Off-the-Shelf) Training. A commercial program, course, or instructional service that is deliverable without modification/alteration or development resulting in increased cost to the Government.

Micro-Purchase Threshold. The micro-purchase threshold is as follows for non-procurement

cardholders: \$3,500 for supplies, \$2,000 for construction, and \$2,500 for services. For this P&P, the \$2,500 threshold for services applies.

Non-procurement cardholder. An individual that has been delegated authority to use the purchase card up to the micro-purchase threshold.

Simplified Acquisition Threshold. A dollar amount not to exceed \$150,000 for supplies and services.

Training Approvers. The manager or supervisor that is authorized to approve and/or recommend short- and long-term training for employees who report to them. Refer to P&P 440.1, Section 4, dated July 21, 1998.

Vendor Code. A unique number to reflect the proper remit address for the payment in the Financial Management Modernization Initiative (FMMI). In general, the vendor code should not be based upon the address that was associated with registration or the company address.

4. Background

According to the Office of Personnel Management (OPM) Training Policy Handbook, agencies may use an authorized training form to procure and certify payment of training. The Department of Agriculture has designated the Standard Form (SF)-182 as that instrument. AgLearn provides an automated Authorization, Agreement, and Certification for Training, SF-182. The provisions of FAR Part 13 do not apply when using the SF-182, including any synopsis and posting requirements. In addition, a requisition is not required when using the SF-182.

5. Conditions for Using the SF-182

The SF-182 is authorized for use under the following conditions:

- The training cost of a single training event, program, or instructional service does not exceed the simplified acquisition threshold (\$150,000).
- The cost is based upon a commercially published price list per student, course, program, or service; and,
- The program, course, or instructional service is off-the-shelf.

6. Policy

It is Research, Education, and Economic's (REE) policy that:

- The purchase card is the preferred method to pay for training under \$2,500.
- The SF-182 shall be approved by an authorized training approver/fundholder other than the cardholder and shall be used to document and approve all training. Copies of the SF-182 shall be forwarded to the appropriate training designees to ensure that their training is recorded.
- To pay for training over \$2,500, the SF-182 form must be forwarded to the appropriate payment office listed in Section C.6, Billing Instructions.
- A copy of the approved SF-182 is to be kept in the cardholder's purchase card file as supporting documentation.
- A requisition is not required when using an SF-182 for off-the-shelf training since its use would be redundant.
- Offices shall consolidate SF-182's for employees attending the same course at the same time (when appropriate) and forward them to the appropriate payment office listed in Section 7 when the total cost exceeds \$2,500.
- If the training vendor does not accept payment by purchase card, forward the SF-182 to the appropriate payment office listed in Section C.
- Prior to procuring/paying for off-the-shelf training, cardholders are to ensure that:
 1. The cost does not exceed the cardholder's single purchase limit; and
 2. The SF-182 has been signed by an authorized training approver/fundholder.
- If a course does not meet the off-the-shelf requirements (i.e., customized training is needed to meet an agency's needs), the training must be acquired through your local servicing Contracting Officer. To obtain customized training, offices must process a requisition through the Integrated Acquisition System, along with a detailed statement of work, list of deliverables, and desired delivery dates.
- In exceptional circumstances where EFT is not accepted by an institution, an SF-182 must be completed and with written correspondence from the vendor stating that they do not accept EFT as a form of payment for training. This information should then be sent to the requiring office's local servicing Contracting Officer for the training to be paid

using a purchase card. The SF-182 and written correspondence from the vendor shall be maintained by in the Contracting Officer's file for the subject purchase to document the transaction.

7. Billing Instructions

In block C.6 Billing Instructions, of the SF-182, enter the appropriate billing address for the training facility to forward the invoice. Also, enter the FMMI vendor code and document reference number in block C.4 of the SF-182 to ensure prompt payment. The originating office or training designee must request a copy of the FMMI Vendor printout from the BSC Budget Analyst or BSCBFO. If the training vendor has not been added in the FMMI system, the originating office or training designee must work with the BSC Budget, Travel and Agreements Branch (or the appropriate vendor coordinator) to add and obtain a FMMI Vendor Code.

For Federal vendors ONLY: The National Finance Center (NFC) is under a reimbursable agreement with ARS; therefore, when forwarding an SF-182 training form to NFC for processing, block C.4 must contain a purchase order (PO) number generated by NFC from the FMMI system. For additional information on completing an SF-182 for a Federal vendor, contact the AgLearn Human Resource Specialist at arsaglearn@ars.usda.gov.

PAYMENT OFFICES

Agricultural Research Service

- **All ARS Offices USDA, OCFO**
Controller Operations Division, ACPRB
ARS Operations Section
P.O. Box 53326
New Orleans, Louisiana 70153

(SPECIAL INSTRUCTIONS FOR ARS OFFICES USING THE ARS OPERATIONS SECTION AS THE PAYMENT OFFICE)

Forward the SF-182 to the ARS Operations Section upon signature of the training approver along with a screen print (preferred) of the VEND record. This is used to enter an obligation into FMMI so that funds are set aside until such time as the invoice is received from the vendor per the billing instructions in block 6.

Economic Research Service (ERS)

Economic Research Service (ERS)
Training Officer - Room 7-228
1400 Independence Ave., SW Mail Stop 1800
Washington, D.C. 20250-1800
FAX: 202-245-5467

National Institute of Food and Agriculture (NIFA)

National Institute of Food and Agriculture (NIFA)
ARS/AFM/NCRBSC/Budget & Travel Branch
5601 Sunnyside Avenue
GWCC, Mail Stop 5152
Beltsville, MD 20705-5152

National Agricultural Statistics Service (NASS)

NASS/DAFO/BASO
1400 Independence Avenue
Room 5053 South Bldg.
Washington, D.C. 20250

(SPECIAL INSTRUCTIONS FOR NIFA ONLY)

To pay for training over \$2,500, each Unit will complete the SF-182 and obtain the necessary signatures. A document control number (DCN) should be assigned to the SF-182. The Unit will forward the completed SF-182 to their NCRBSC Financial Technician. NCRBSC will input into FMMI a manually entered obligation document (known as an MO).

For block 6, Section C – Costs and Billing Information, each Unit will identify their respective address. Once the Unit receives an invoice, the invoice should be reviewed and signed by the Unit's Deputy Administrator. After signature, the invoice should be forwarded to NCRBSC for payment processing. NCRBSC will input into FMMI a payment document, known as a PV, referencing the MO originally established. This will initiate payment.

MICHAEL L. BARNES
Director, Acquisition and Property Division

__10/27/2015__
Date